

# McDermott Will & Emery

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October 21, 2010

## VIA ELECTRONIC FILING

Hon. Arthur D. Spatt  
Eastern District of New York  
100 Federal Plaza  
P.O. Box 9014  
Central Islip, NY 11722

FILED  
IN CLERKS OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ OCT 22 2010 ★

LONG ISLAND OFFICE

Re: Muhammed Qadri v. Vohra Health Services, PA, 09-CV-00168 (ADS)(ETB)

Dear Judge Spatt:

My firm represents Vohra Health Services, PA ("Vohra"), the Defendant/Counterclaim-Plaintiff in the above-referenced action. Although this Court's rules do not appear to require it, the parties jointly write this letter in an effort to keep the Court apprised of the status of summary judgment proceedings.

Both parties intend to move for summary judgment, and have therefore exchanged Rule 56.1 statements pursuant to Rule IV(D)(i).<sup>1</sup> Due to scheduling conflicts (including the pending birth of a baby to the wife of counsel appearing in this matter), the parties have agreed upon the following dates for the completion of the pre-motion process:

November 8, 2010 Last day to serve counter-statements pursuant to Rule IV(D)(i)

November 25, 2010 Last day to serve upon the court requests for pre-motion conference pursuant to Rule IV(D)(ii)

I am aware that counsel for Qadri has requested and been granted an extension of her time to serve upon the Court a request for pre-motion conference pursuant to Rule IV(D)(ii). (See Pacer Doc. 40.) This request was made prior to a recent conference between counsel. Therefore, I am uncertain how that request affects the schedule outlined above.

Counsel for the parties respectfully submit that coordinating the schedule so that both parties' papers are due on the same days will minimize any potential confusion and increase the efficiency of the process.

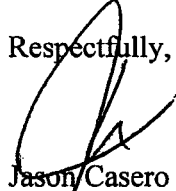
<sup>1</sup> All references to the Rules follow from the "Individual Motion Practices of Judge Arthur D. Spatt."

C/F  
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Accordingly, the parties jointly seek the endorsement of the Court with regard to the proposed schedule.

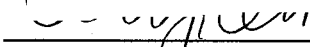
Respectfully,



Jason Casero  
*Counsel for Vohra Health Services, P.A.*

cc: Rompel Sachdeva-Alam, Esq. (via electronic mail)  
*Counsel for Muhammed K. Qadri, M.D.*

*Request granted.*

So Ordered:   
U.S.D.J. Arthur D. Spatt

*10/22/10*

MOVANT'S COUNSEL IS DIRECTED TO SERVE A  
COPY OF THIS ORDER ON ALL PARTIES UPON  
RECEIPT VIA FACSIMILE.